

Melissa S. Woods **Partner**

o 212.356.0234

f 646.473.8234 mwoods@cwsny.com www.cwsny.com

900 Third Avenue, Suite 2100 • New York, NY 10022-4869

October 30, 2023

By ECF

Honorable Lewis J. Liman **United States District Court** Southern District of New York 500 Pearl Street, Room 1620 New York, NY 10007

The requests are GRANTED. The Initial Pretrial Conference is adjourned to December 18, 2023 at 4:00 PM. Parties are directed to dial into the Court's teleconference number at 888-251-2909, Access Code 2123101, and follow the necessary prompts.

LEWIS J. LIMAN

October 31, 2023

Davis v. The NewsGuild of New York, Local 31003, TNG/CWA, AFL-CIO, et Re:

al., No. 23-CV-7606 (LJL) (S.D.N.Y.)

SO ORDERED.

Dear Judge Liman:

This Firm represents Defendant NewsGuild of New York, Local 31003, TNG/CWA, AFL-CIO (the "Guild") in the above-referenced matter. Pursuant to Section 1(D) of Your Honor's Individual Rules, we write jointly with Defendant Local Representatives Guild ("LRG") and Plaintiff Barbara Davis to respectfully request that the Court stay all deadlines in this matter for thirty days so that the parties can continue their efforts to reach an early resolution of this matter. All parties consent to this request.

On October 19, 2023, the Court scheduled an initial pretrial conference for November 14, 2023, and directed the parties to submit a proposed Case Management Plan and Scheduling Order by November 7, 2023. Docket No. 9. The deadline to answer or otherwise respond to the Complaint is October 31, 2023. Docket Nos. 7, 8.

To enable the parties to focus their efforts on resolving this matter, the parties respectfully request that the Court: (a) extend the Guild and LRG's respective deadlines to answer or otherwise respond to the Complaint until November 30, 2023; and (b) adjourn the initial pretrial conference until a day and time that is convenient for the Court in December 2023 and extend the corresponding deadline to submit a proposed case management plan. This is the parties' first request for an extension of either deadline.

> Respectfully submitted, Milian Woods

Melissa S. Woods

cc: Bennet Zurofsky (bzurofsky@zurofskylaw.com) Joshua Parkhurst (JParkhurst@gileslawfirmllc.com)